

Our Ref: 50285.1

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**VIA ECF**

Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Rio Tinto plc v. Vale, S.A., et al.  
Civ. Action No. 14-cv-3042 (RMB) (S.D.N.Y.)

Dear Judge Berman:

We write jointly on behalf of all appearing parties to request that the Court enter the enclosed proposed second amended scheduling order. All appearing parties have consented to the order.

Respectfully,

/s/ Vincent Filardo, Jr.  
Vincent Filardo, Jr.

**Enclosure**

cc: Hon. Andrew J. Peck (by hand delivery)  
All Counsel of Record (by e-mail)